

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No. 1:18-CR-109(2)
	:	
Plaintiff,	:	
	:	
v.	:	District Judge Cole
	:	
SERGHEI VERLAN,	:	MOTION TO WITHDRAW AS TRIAL
	:	ATTORNEY FOR DEFENDANT
Defendant.	:	SERGHEI VERLAN

Now comes Michael K. Allen, ("Movant"), and pursuant to Local Civil Rule 83.4(c), hereby moves this Honorable Court for leave to withdraw as trial attorney for Serghei Verlan ("Mr. Verlan"), Defendant in the above captioned case. In accordance with Rule 83.4(c)(2), Movant hereby certifies 1) that Mr. Verlan will be served with a copy of this motion and the certificate of service will so state, 2) that because a fundamental disagreement has arisen between Mr. Verlan and Movant, "good cause" to permit the requested withdrawal as is defined by the Rules of Professional Conduct does exist in this case, and finally 3) that the "good cause" asserted herein is evidenced by the fact of Mr. Verlan's continued insinuations that Movant's assistance in this matter may be ineffective, a fact to which Movant hereby attests by signing below.

Respectfully submitted,

/s/ Michael K. Allen
Michael K. Allen (0025214)
MICHAEL K. ALLEN & ASSOCIATES
4010 North Bend Road
Suite 200
Cincinnati, Ohio 45211
(513) 321-5297
Counsel for Defendant, Serghei Verlan

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Withdraw was electronically filed on this 14th day of January, 2021. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. I further certify that a copy of the foregoing was served via regular United States mail upon Defendant, Serghei Verlan c/o the Boone County Jail at P. O. Box 898, Burlington, Kentucky 41005.

/s/ Michael K. Allen
Michael K. Allen